



THE CITY OF NEW YORK
LAW DEPARTMENT

JAMES E. JOHNSON
Corporation Counsel

100 CHURCH STREET
NEW YORK, NY 10007

CHRISTOPHER D. DELUCA
Senior Counsel
Phone: (212) 356-3535
Fax: (212) 356-3509
Email: cdeLuca@law.nyc.gov

February 27, 2020

BY ECF AND BY FAX

Honorable Naomi R. Buchwald
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: Deshawn Gaddy v. City of New York, et al., 17 Civ. 08960 (NRB)

Your Honor:

I am a Senior Counsel in the Office of James E. Johnson, Corporation Counsel of the City of New York, and the attorney assigned to the defense of the above-referenced matter. In that capacity, I write with the consent of plaintiff's counsel, Rose M. Weber, to request an extension of the date to submit a pre-motion conference letter from March 4, 2020 up to and including April 10, 2020. This is the second request for an extension of the date to submit a pre-motion conference letter.

On February 6, 2020, plaintiff's counsel, with the consent of the undersigned, requested a sixty day stay of discovery in this matter, to which Your Honor granted a final discovery extension of thirty days. See Docket Entry Nos. 48 and 49. However, based on the current discovery schedule, the deadline to submit a pre-motion conference letter is March 4, 2020, which is during the discovery period. Accordingly, defendants request an extension of the date to submit a pre-motion conference letter from March 4, 2020 up to and including April 10, 2020, a date after the close of the current discovery schedule.

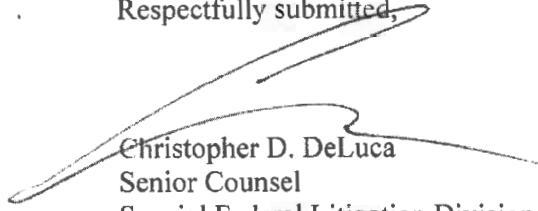
In view of the foregoing, it is respectfully requested that the Court grant the within requests. Thank you for your consideration in this matter.

*So Ordered
FINAL
EXTENSION.*

Naomi R. Buchwald

3/2/20

Respectfully submitted,



Christopher D. DeLuca
Senior Counsel
Special Federal Litigation Division

cc: Rose M. Weber, Esq. (By ECF)
Rose M. Weber Law Office
Attorney for Plaintiff